

**THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

**ORACLE CORPORATION,**

**Plaintiff,**

**v.**

**CHARTIS SPECIALTY INSURANCE  
COMPANY,**

**Defendant.**

Civil Action No. 1:18-cv-3440 (GHW)

**ORAL ARGUMENT REQUESTED**

**DECLARATION OF ROBIN L. COHEN IN SUPPORT OF PLAINTIFF'S MOTION  
FOR PARTIAL JUDGMENT ON THE PLEADINGS**

I, Robin L. Cohen, declare under penalty of perjury as follows:

1. I am a principal of McKool Smith, and counsel to Plaintiff Oracle Corporation (“Plaintiff”). I am a member in good standing of the bar of the State of New York and of this Court.
2. Attached hereto as Exhibit A is a true and correct copy of the Complaint in the matter styled *Rosenblum, et al. v. Oracle America, Inc., et al.*, Case No. 14 CV 20043 (Or. Cir. Ct., Marion Cnty.), previously filed as Exhibit A to Plaintiff’s Motion for Partial Judgment on the Pleadings (Dkt. # 37-1).
3. Attached hereto as Exhibit B is a true and correct copy of Defendant Chartis Specialty Insurance Company’s July 19, 2017 letter, previously filed as Exhibit B to Plaintiff’s Motion for Partial Judgment on the Pleadings (Dkt. # 37-2). Portions of this letter have been redacted in conformity with the Court’s July 20, 2018 Order (Dkt. # 45).

4. These exhibits are being re-filed under cover of this declaration pursuant to the Court's July 20, 2018 Order (Dkt. # 45.)

Date: July 20, 2018

By:   
Robin L. Cohen  
[rcohen@mckoolsmith.com](mailto:rcohen@mckoolsmith.com)